

## **Ferree, Melissa A. (DNREC)**

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**From:** Ev Ashworth <EAshworth@algcorp.com>  
**Sent:** Friday, December 19, 2014 11:21 AM  
**To:** Ferree, Melissa A. (DNREC)  
**Cc:** Corash, Michele; Gershwin, Dan  
**Subject:** RE: Bloom Energy

Understood; we will provide both the hauler and TSDf when we submit the applications forms.

As to the volume of wastes: we have explained to Bloom that there can only be one shipment under a temporary ID. They are working to confirm the correct volumes for this single shipment, which will vary based on the size of the installation. The 27 MW Redlion facility will have more canisters than a 3 MW installation. When we've drilled this down the with Bloom, we'll provide our best estimate as to the volumes that are anticipated from each facility.

Thanks again for following up – and let me know if there are additional questions.

Best, Ev



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**From:** Ferree, Melissa A. (DNREC) [mailto:[melissa.ferree@state.de.us](mailto:melissa.ferree@state.de.us)]  
**Sent:** Friday, December 19, 2014 8:13 AM  
**To:** Ev Ashworth  
**Cc:** Corash, Michele; Gershwin, Dan  
**Subject:** RE: Bloom Energy

Ev,

I know we discussed before, but I forgot to mention it again today, please include the name and EPA ID number of the transporter and the TSD in the comment field on the forms.

Also, originally, we were only talking about 2 temporary EPA ID numbers, as there were only 2 canisters that needed to be shipped. Given, you indicated you're submitting four forms, has the number of canisters changed since we originally talked last week?

Thanks,  
Melissa

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**From:** Ev Ashworth [mailto:[EAshworth@algcorp.com](mailto:EAshworth@algcorp.com)]  
**Sent:** Friday, December 19, 2014 11:07 AM

**To:** Ferree, Melissa A. (DNREC)  
**Cc:** Corash, Michele; Gershwin, Dan  
**Subject:** RE: Bloom Energy

Melissa:

Good to chat this morning. We are working to confirm the exact legal site operator's name with Bloom, and will be sure that this information is accurate as applied to Section 9B of the temporary waste ID applications.

Also, to keep everyone in the loop, we discussed how benzene is introduced into the filter media, as benzene is present in pipeline-supplied natural gas. Finally, we will double check with Bloom to be sure that the Small Quantity/Large Quantity generator status is correct for each site/temporary ID. We expect to get the applications to you today for all four BE sites in Delaware.

Thanks again.

Ev



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**From:** Ferree, Melissa A. (DNREC) [<mailto:melissa.ferree@state.de.us>]  
**Sent:** Friday, December 19, 2014 5:42 AM  
**To:** Ev Ashworth  
**Cc:** Corash, Michele; Gershwin, Dan  
**Subject:** RE: Bloom Energy

Ev,

Thanks for the summary. Maybe I misunderstood yesterday, but I recall talking about the ownership of the sites and the dates of ownership. I don't recall specifically discussing who was going to be listed as the operator. If you are not planning on listing Bloom Energy as the operator, who will be listed as the operator? I have some concern about this and we can discuss later today if necessary. I'll be in the office until 2pm or so today.

Thanks,  
Melissa

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**From:** Ev Ashworth [<mailto:EAshworth@algcorp.com>]  
**Sent:** Thursday, December 18, 2014 7:06 PM  
**To:** Ferree, Melissa A. (DNREC)  
**Cc:** Corash, Michele; Gershwin, Dan  
**Subject:** Bloom Energy

Melissa:

Thanks for your time this afternoon. As promised, I write to document/confirm our discussions over the phone this afternoon.

**Action Item**

You asked Bloom to provide a copy of a Uniform Waste Manifest for a shipment of the sorbent filtering media from the Unicat Texas facility that demonstrates that these materials are managed as RCRA hazardous wastes. This manifest will be used to provide evidence to the DNREC Deputy Secretary that no environmental harm resulted from the management of desulfurization canisters from Bloom's Delaware operations. I confirmed that a single uniform manifest will be sufficient for your purposes. We will send this over directly.

**Temporary Waste ID**

- 1) We agreed that DNREC will list the facilities as "BE-Redlion," "BE-JP Morgan," etc. "Bloom Energy" will not be listed as the operator.
- 2) Following a general discussions, we understand that it is DNREC's policy is not to contact JP Morgan or the other sites. Rather DNREC will issue the temporary IDs directly to Bloom.
- 3) DNREC understands that despite our best efforts, Bloom has been unable to confirm the date when DelDOT and Delmarva Power purchased their properties. The January 1900 date, which will be entered on the form, is sufficient for the purposes of the temporary ID.
- 4) DNREC acknowledges that the JP Morgan site does have a waste ID. Consistent with earlier discussions with Michele, DNREC understands that the temporary ID will be issued to Bloom, and that Bloom will be responsible for the proper management of the canisters while accumulated at the JP Morgan site (and the other sites), and that Bloom will be responsible for the proper manifesting/shipment of the canisters offsite via a licensed hauler to the TSDF. Again, DNREC does not plan to contact JP Morgan regarding the temporary permit or the management of the spent containers under the Temporary ID.

Please hit REPLY ALL if I've not properly summarized an issue, or omitted an issuance of importance. Thanks again for your continued assistance on this important matter, for which we are all very appreciative.

Best, Ev



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